FAQ's

for Operator Training

Question: What is Operator Training?

Answer: Operator training is a mandated program required by the Energy Policy Act of 2005 [Public Law 109-58]. The program requires that underground storage tank (UST) facilities have three classes of individuals trained in proper operation and maintenance of regulated UST systems.

Question: What are the three classes of Operators?

Answer: Class A Operators have primary responsibility to operate and maintain a UST. The Class A Operator's responsibilities often include managing resources and personnel, such as establishing work assignments, to achieve and maintain compliance with regulatory requirements. Class A Operators are also primarily responsible for making sure that any suspected release or reportable spill is reported in a timely manner to IEMA (and 911 where required) and that financial responsibility requirements are met for the facility.

Class B Operators implement applicable UST regulatory requirements and standards in the field, including the day-to-day aspects of UST operation, maintenance and recordkeeping at one or more UST facilities.

Class C Operators are responsible for responding to alarms or other indications of emergencies caused by spills or releases from USTs. Not all employees of a UST facility are necessarily Class C Operators.

Question: Do I have to have someone designated in each class at my facility?

Answer: Yes. Facilities will be required to have at least one person designated in each class. One person can be designated as a Class A, Class B <u>and</u> Class C Operator, or separate individuals can be designated for each class. A Class A and/or Class B can be designated for more than one facility. Anytime Class A and B Operators are not permanently onsite or assigned to more than one facility, the onsite records must include the phone numbers of the A and B Operators.

Question: Do I have to have all three classes of individuals on site at all times?

Answer: No. For a manned facility, you must have at least one of the Operator's onsite at all times. For an unmanned facility, you must conspicuously post emergency contact information for the Class A, B and C Operators, including their names and telephone numbers, unless a toll-free number for 24 hour dispatch to the facility has been prominently displayed. Beginning August 8, 2012, at no time may a facility operate without a validly trained Class A, B and C Operator.

Question: What is the difference between a manned facility versus an unmanned facility? **Answer:** A manned facility means a UST facility that has a responsible attendant present during all hours of operation. An unmanned facility means a UST facility that does not have a responsible attendant present during all hours of operation. If a facility is unmanned for any portion of each day, week or month, it must meet requirements for an unmanned facility.

Question: What is the deadline date that facilities will be required to have their individuals trained?

Answer: The deadline date is August 8, 2012.

Question: Can we get an extension to this date?

Answer: No. This date is mandated by the Energy Policy Act of 2005.

Question: Does Illinois allow reciprocity with other states?

Answer: No. Each individual will be required to have training and pass an Illinois approved exam.

Question: What is the minimum passing score?

Answer: The minimum required passing score shall be at least 75%.

Question: How often does our class of Operators have to take the training and exam?

Answer: Every two years.

Question: If I hire a new employee after the August 8, 2012 deadline, how soon do they have to take the training?

Answer: Class A and B Operators must be trained <u>within 30 days</u> after assuming operation and maintenance responsibilities for a UST. Class C Operators must be trained <u>before</u> assuming responsibility involving emergency response.

Question: Can my Class A or B Operators train our Class C Operators?

Answer: Only if they have submitted the "Underground Storage Tank Training Course Approval Application" and the submitted class has received written approval from the Office of the State Fire Marshal (OSFM). The application for course approval can be found at: http://www.sfm.illinois.gov/commercial/ust/operatortraining.aspx

Question: Is there a fee involved with the training and exam?

Answer: Yes. The training is provided by third parties who offer OSFM-approved training programs. The UST facility owner or operator shall pay the approved provider a reasonable fee.

Question: Where can I find an approved list of providers for Illinois?

Answer: A list of approved providers can be found at:

http://www.sfm.illinois.gov/commercial/ust/operatortraining.aspx

As we approve training providers, their names and contact information will be added to the web page.

Question: What types of records do I have to maintain at the facility?

Answer: At a manned facility,

- a list of the designated Class A, Class B and Class C Operators for the UST facility (identified by facility number and address);
- completion certificate issued by the approved provider;
- a copy of the current Class C Operator instructions or procedures;
- a copy of the written UST facility operation and maintenance plan; and
- all quarterly inspection checklists for the past two years.

The UST owner shall provide all Class C Operators with written instructions that include:

- emergency response procedures;
- procedures for overfill protection;
- operation of emergency shut-off systems;
- appropriate responses to all alarms;
- reporting of leaks, spill and releases;
- site specific emergency procedures; and

 the names and other information needed for contacting appropriate parties if a leak, spill, release or alarm occurs.

At an unmanned UST facility, the same records as above shall be maintained at the facility or be made available to the OSFM inspector within 30 minutes of a request or before OSFM completes its inspection, whichever is later.

Anytime Class A and B Operators are not permanently onsite, or if they are assigned to more than one facility, the onsite records must include the phone numbers of the A and B Operators.

Question: What is a "Written Facility Operations and Maintenance Plan"?

Answer: UST facility owners and operators in conjunction with their designated Class A and B Operators must adopt and implement a written operations and maintenance plan signed by both the owner and either the designated Class A or B Operator for the UST facility. The plan shall be kept at the facility for the life of the UST and shall be updated to reflect changes as they occur.

At a minimum the plan shall include:

- a detailed plan showing what inspections, operations, testing, maintenance and recordkeeping shall be done on a daily, monthly, quarterly and annual basis;
- a description of the manner in which UST facility owners and operators properly dispose of regulated substances spilled at the facility; and
- emergency procedures and instructions.

The certified operators shall ensure that all inspections and testing, as outlined in the operations and maintenance plan, are properly performed. They shall also ensure that the work is performed by an OSFM licensed contractor. The certified Operators shall provide the UST facility owner and operator with a copy of each inspection checklist and alert the owner and operator to any condition that requires follow-up actions.

Question: Who can perform the quarterly inspections?

Answer: Either the Class A or Class B Operator.

Question: Where can I find the quarterly checklist?

Answer: The OSFM Quarterly Equipment Inspection Checklist can be found at:

http://www.sfm.illinois.gov/commercial/ust/operatortraining.aspx

Question: If the OSFM performs an inspection of my facility and finds deficiencies and writes a Notice of Violation (NOV), will I be required to have my Class A and Class B Operator retrained?

Answer: Yes, if certain violations are noted. Retraining (including both training and testing) is required for both the facility's Class A and Class B Operators if OSFM determines that any aspect of the facility is out of compliance with release detection, corrosion protection, spill and overfill or financial responsibility, or if the facility fails to designate its A, B and C Operators and have those Operators complete the training required under the operator training rules. The OSFM will issue a NOV and the retraining must be completed within 60 days of the issuance of the NOV. If an NOV triggers retraining, that NOV cannot be considered to be complied with until both A and B Operators have completed their training.

Question: Can my UST systems be red tagged if I don't have my Class A and Class B Operators retrained within 60 days?

Answer: Yes.

Question: Who can I contact if I have additional questions pertaining to the Operator Training Program? **Answer:** If you cannot find the answer to your question in the Operator Training rules (available at http://www.sfm.illinois.gov/commercial/ust/operatortraining.aspx), you may then contact the Division of Petroleum and Chemical Safety at (217)785-1020 or www.SFM.DPCS@illinois.gov.